REMARKS

Applicants request favorable reconsideration and allowance of the subject application in view of the preceding amendments and the following remarks.

In reviewing the subject application, Applicants note an error on the Notice of References Cited by the Examiner (PTO-892 form), which accompanied the above-noted Office Action. Specifically, the Japanese patent document cited by the Examiner is listed as "JP 200209838 A." This document, however, should be noted as -- JP 2000209838 A --. Applicants request that the Examiner correct this citation.

The specification has been amended to place the subject application in better form. A new abstract has also been presented in accordance with preferred practice. By separate, Applicants request approval to amend Figs. 19A-22, 24A-24D, 25B, 26B and 28C. Specifically, Applicants request approval to label Figs. 19A-22 as "PRIOR ART," as requested by the Examiner, and have requested correction of a minor informality in the remaining drawings. The Examiner will note, however, that Applicants have not requested that Fig. 1 be labeled as "PRIOR ART," inasmuch as that figure shows an overall exposure apparatus according to the first embodiment. No new matter has been added by these changes.

Claims 40-99 are presented for consideration in lieu of claims 1-39, which have been canceled without prejudice or disclaimer. Claims 40, 45, 48, 49, 52-54, 61, 62, 70, 71, 77, 78, 85, 86, 92, 93 and 99 are independent. Support for these claims can be found in the application, as filed. Therefore, no new matter has been added.

Applicants request favorable reconsideration and withdrawal of the objection and rejections set forth in the above-noted Office Action.

Claims 1-39 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. These claims having been canceled, this rejection has become moot and should be withdrawn. Nevertheless, the Examiner's comments were taken into consideration when presenting claims 40-99.

Applicants note with appreciation that claims 3, 4, 6-8, 10-13, 15-32, 34, 35, 38 and 39 were indicated as being allowable, if rewritten in independent form. Applicants earnestly believe, however, that they should be entitled to the protection afforded by claims 40-99, as presented.

Turning now to the art rejection, claims 1, 2, 5, 9, 14, 33, 36 and 37 were rejected under 35 U.S.C. § 102 as being anticipated by U.S. Patent No. 6,002,465 to <u>Korenaga</u>. Applicants submit that this patent does not teach many features of the present invention as previously recited in these claims. Therefore, this rejection is respectfully traversed. Nevertheless, Applicants submit that claims 40-99 amplify the distinctions between the present invention and the cited art.

Generally speaking, the present invention is directed to, among other aspects, linear motor apparatus, methods and apparatus for manufacturing semiconductor devices, and the like. In one aspect, the present invention seeks to decrease a gap in a conventional wound, wire coil, so as to increase the space factor of a copper wire, and thus, increase the density of the drive current supplied to the coil so as to increase the linear motor efficiency for a given constant volume. Thereby, the present invention provides a stage apparatus, for example, having a greater

speed at less power. These features are discussed in more detail on page 3, line 19, to page 4, line 1, of the subject disclosure.

The present invention achieves the foregoing object by using, in, for example, a stage apparatus linear motor, a coil formed by winding a foil-like conductor having an insulating layer in a multi-layered structure (which is termed herein as a "foil coil"). This arrangement increases the space factor of the conductor with respect to the coil section for enhanced efficiency. Thus, a distinctive feature of the present invention is the use of such a foil coil. This feature is also discussed in the subject specification with respect to the embodiments of 1, 3, 4, 6-8 and as shown by Figures 4-13C.

Applicants submit that the cited art does not teach or suggest such features of the present invention, as recited in the independent claims.

The <u>Korenaga</u> patent teaches a stage device used in a semiconductor device manufacturing exposure apparatus, with the stage being driven by a linear motor. That patent, however, does not specifically describe the motor used in that device. See, for example, column 3, lines 40-52, of the <u>Korenaga</u> patent. Applicants submit, therefore, that the <u>Korenaga</u> patent does not teach or suggest at least the feature of the foil coil of the present invention. For these reasons, Applicants submit that the <u>Korenaga</u> patent is silent with respect to the salient features of Applicants' present invention as recited in the above-noted independent claims.

For the foregoing reasons, Applicants submit that the present invention, as recited in independent claims 40, 45, 48, 49, 52-54, 61, 62, 70, 71, 77, 78, 85, 86, 92, 93 and 99, is patentably defined over the cited art, whether that art is taken individually or in combination.

The dependent claims also should be deemed allowable, in their own right, for defining other patentable features of the present invention in addition to those recited in their respective independent claims. Further individual consideration of these dependent claims is requested.

Applicants further submit that the instant application is in condition for allowance.

Favorable reconsideration, withdrawal of the objection and rejections set forth in the above-noted Office Action and an early Notice of Allowance are requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should be directed to our address listed below.

Respectfully submitted,

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